

**ZUMPARNO PATRICIOS POPOK HELSTEN, PLLC**  
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*Pro Hac Vice Application Forthcoming*  
(Admitted *Pro Hac Vice*)  
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Counsel for Defendant,  
DAVID KONO

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEVADA

BASS UNDERWRITERS, INC.

Plaintiff,

v.

DAVID KONO

Defendant.

Case No. 2:22-cv-00138-RFB-EJY

**STIPULATION AND ORDER TO  
EXTEND THE DISPOSITIVE MOTIONS  
DEADLINE**

**(FOURTH REQUEST)**

Defendant David Kono (“Kono”) and Plaintiff Bass Underwriters, Inc. (“Bass”) stipulate for a continuation, the parties’ fourth request of the dispositive motions deadline, and in support of whereof aver as follows:

1. On January 6, 2023, Bass moved on an emergency basis for leave to file an amended complaint to assert claims against Brooks, and to continue the discovery period. (ECF No. 35) Kono filed his response on January 20, 2023 (ECF No. 37). The Court issued an Order, denying the emergency status of the motion (ECF No. 36). This motion is currently pending before the Court.

2. On January 24, 2023, Kono moved, on an emergency basis, for a protective order precluding the deposition of Kono’s employer, Brooks Group Insurance Agency,

1 LLC's ("Brooks") corporate representative (ECF No. 39). Bass filed its response in  
2 opposition to this motion on February 6, 2023 (ECF No. 49), and Kono replied on  
3 February 13, 2023. The Court issued an Order, addressing the emergency request of  
4 the motion by staying Brooks' deposition until the motion is ruled upon (ECF No. 40).  
5 This motion is currently pending before the Court, and, as such, the deposition has  
6 not yet occurred.

7 3. While these motions remain pending, the May 15, 2023 deadline for filing  
8 dispositive motions remains in force (ECF No. 54).

9 4. On April 19, 2023, Kono filed a Stipulation and Order of Substitution of  
10 Counsel (ECF No. 57). The Stipulation and Order of Substitution of Counsel is  
11 currently pending with the Court.

12 5. The parties have conferred and, due to the several motions pending before the  
13 Court, and newly substituted counsel now representing Defendant Kono, the parties  
14 have agreed to a continuation of the dispositive motions deadline to July 17<sup>5</sup>, 2023.

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6. This stipulation is for good cause, and is not for the purposes of delay or prejudice to any party, but in light of newly substituted counsel.

Dated this 21<sup>st</sup> day of April 2023.

Dated this 21<sup>st</sup> day of April 2023.

**ZUMPANO PATRICIOS  
POPOK & HELSTEN, PLLC**

**COZEN O'CONNOR**

/s/ Amanda J. Brookhyser

/s/ Karl O. Riley

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Counsel for Defendant

Counsel for Plaintiff

David Kono

Bass Underwriters, Inc.

**ORDER**

IT IS SO ORDERED.

DATED this 21st day of April, 2023.

  
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THE HONORABLE ELAYNA J. YOUCHAH  
UNITED STATES MAGISTRATE JUDGE